



# California Regional Water Quality Control Board Central Valley Region

Robert Schneider, Chair



Arnold  
Schwarzenegger  
Governor

Linda S. Adams

Secretary for  
Environmental Protection

## Sacramento Main Office

11020 Sun Center Drive #200, Rancho Cordova, California 95670-6114  
Phone (916) 464-3291 • FAX (916) 464-4645  
<http://www.waterboards.ca.gov/centralvalley>

30 August 2006

Dr. David Sedlak  
Department of Civil and Environmental Engineering  
657 Davis Hall  
University of California  
Berkeley, CA 94720-1710

## CLARIFICATION OF SCIENTIFIC REVIEW COMMENTS ON THE DRAFT DELTA METHYLMERCURY BASIN PLAN AMENDMENT

Thank you very much for your scientific review comments that you provided on 8 August 2006. We sincerely appreciate your careful consideration of the draft staff report, *"Amendments for the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins for the Control of Methylmercury in the Sacramento- San Joaquin Delta Estuary"* and supporting document, the *Delta TMDL for Methylmercury Report*. We will consider your comments in a revised draft Basin Plan Amendment and staff report.

We would appreciate if you could elaborate on your response to one issue. In the peer review request letter, you were asked to "...determine "whether the scientific portion of the proposed rule is based upon sound scientific knowledge, methods and practices". In Attachment 2 of the peer review request letter, we highlighted three scientific issues from the draft Delta methylmercury Basin Plan Amendment for such a determination. The third issue was the, **"Effectiveness of proposed implementation actions in achieving the desired reductions in methylmercury in ambient water and fish tissue."**

In your letter, you commented on the potential effectiveness of controlling sources of total mercury and methylmercury from municipal and industrial facilities. Could you please comment on whether your understanding of the science supports other parts of the proposed methylmercury control program, including the proposal to require studies to further characterize loads and develop control practices for methylmercury from managed wetlands, agricultural sources, and urban runoff? For existing discharges in these categories, the proposed Basin Plan Amendment only requires characterization and control studies. At the end of the study period (2014), the Central Valley Water Board would evaluate the results and determine whether some or all of the methylmercury sources would be required to implement management practices to reduce methylmercury.

For your reference, staff's reasons for addressing methylmercury sources (instead of just sources of inorganic mercury) are on page 31 of the draft Basin Plan Amendment Staff Report and description of a Delta study that showed differences in methylmercury productions in

*California Environmental Protection Agency*

adjacent wetlands with different design characteristics is on page 57. A description of options for actions addressing nonpoint sources of methylmercury begins on page 75.

Thank you very much for your time and willingness to add to your original response. If you have questions, you may contact me at (916) 464-4621 or email at [pmorris@waterboards.ca.gov](mailto:pmorris@waterboards.ca.gov). You may also contact Janis Cooke at (916) 464-4672 or email at [jcooke@waterboards.ca.gov](mailto:jcooke@waterboards.ca.gov).

Patrick Morris  
Senior Water Quality Control Engineer  
Mercury TMDL Unit

cc: Gerald Bowes, State Water Resources Control Board